



November 13, 2003

Mr. Kevin Turner
On-Scene Coordinator
U.S. EPA, Region 5
8588 Rt. 148
Marion, IL 62959

Via Certified Mail

Re: RRG/Clayton Chemical Site, Sauget,
Illinois - Docket No. V-W-'03-C-720
MONTHLY PROGRESS REPORT
October 03

File: 11331/31861 #2

Dear Mr. Turner:

On behalf of the Performing Members, RRG Clayton Chemical Site Liquids Group (The Group) and in accordance with the October 11, 2002 Administrative Order by Consent and the January 14, 2003 Work Plan approval, we are submitting this progress report for the month of October, 2003.

1. WORK PERFORMED & PROBLEMS ENCOUNTERED DURING OCTOBER, 2003

- Clean Harbors continued removal of LHS from tanks.
- Collected additional characterization samples from several tanks for analyses.
- Completed and approved several waste profiles for liquid material in tanks (blended fuels, F-code wastewater, MEK, and perchloroethylene) and drums.
- Cleaned tanks B3, B4, and G7 per the Order and met with IEPA and USEPA Contractor to inspect tank bottoms of tanks B2, B3, B4, and G6.
- Received request from Clean Harbors to perform additional sampling and analysis of material in tank G4 (not accepted for fuel blending previously). Analysis would cover landfill acceptance criteria.
- Sample of material in tank G4 was submitted to Kiesel, a petroleum recycling facility in St. Louis, MO for acceptance – results indicated high moisture; therefore, this material was not acceptable. Alternatives for disposal of this LHS are still being evaluated.
- Requested approval from RRG to cut holes in tanks as needed for LHS removal – approval pending.
- Approximate LHS removed is 93% of anticipated tank total, excluding tank G4 (approximately 70,300 gallons) and 0% of drum total; time expended is beyond original schedule. Estimated completion (excluding tank G4) is the end of November 2003. Formal notification to USEPA of scheduling change, per the Order is pending determination of disposal option for LHS in tank G-4.

2. ANALYTICAL DATA RECEIVED DURING OCTOBER, 2003

Received analytical data for liquids in tanks A1, B1, B2, G4, G5, G8, G11, S1, S3, S5, 11, 33, 37, and 46.
Received analytical data for liquids in drums 2-4, 7, 32, 39, 40, 46-51, 54, 55, 57, 60, 61, 68, 86, 107, 110, 111, 115-117, 121, 170, 183, 190, 194, 195, and 233-238.



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3. WORK ANTICIPATED NEXT MONTH

- Continue liquids removal in tanks
- Meet with USEPA to clarify solid material remaining in tanks following LHS removal and tank cleaning
- Continue evaluation of disposal options for contents of tank G4
- Clean tanks after liquids removed
- Remove drums

Please contact me at 248.661.3745, ext. 13 if you have any questions.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.



Scott L. Cormier, P.E.
Senior Managing Engineer

cc: Mr. Tom Turner, U.S. EPA Associate Regional Counsel, Chicago, IL
Performing Members – RRG Clayton Chemical Site Liquids Group
O'Brien & Gere Team